

DEFINING BOUNDARIES FOR LOCAL HISTORIC DISTRICTS

When defining local historic district boundaries historic district study committees must use the guidelines developed by the U. S. Secretary of the Interior for determining historic district boundaries for the National Register of Historic Places. While the complete guidelines can be found in *National Register Bulletin 15: How to Apply the National Register Criteria* and *National Register Bulletin 21: Defining Boundaries for National Register Properties* available from the National Park Service, a summary is provided below.

According to *National Register Bulletin 15: How to Apply the National Register Criteria*:

A district must be a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects or by documented differences in patterns of historic development or associations. It is seldom defined, however, by the limits of current parcels of ownership, management or planning boundaries. The boundaries must be based upon a shared relationship among the properties constituting the district. (p. 6)

Historic districts are typically a concentrated area of contiguous resources. Historic district boundaries should be based on three factors: historic significance, physical integrity of the resources, and/or the location of significant geographic features. While boundaries based on integrity and geography are determined by observation, boundaries based on historic significance are identified on the basis of research. Some issues to consider when determining boundaries for historic districts are:

- Start with a map that shows the original or historic boundaries for the area you are studying, such as the original plat of a subdivision or the legally recorded boundaries of a farmstead. Changes that have occurred in the area over time should be evaluated against the original boundaries.
- Look for distinctive visual geographic barriers that mark a change in the character of the area or that interrupt the continuity of the resources in the district. **Example:** a river, ravine, or lake or the construction of a major highway that bisected a district.
- Look for visual changes in the character of the area due to different architectural styles, building types, or periods. **Example:** the distinct change from a concentration of nineteenth century Queen Anne homes to a subdivision of twentieth century brick ranch houses or a change in the type and character of resources due to differentiated patterns of historical development such as commercial, residential or industrial.
- Look for visual changes that are the result of the significant loss of historic materials due to inappropriate alteration or the loss of historic resources through demolition. When selecting boundaries for historic districts, include the area that contains the highest concentration of intact resources. Exclude the peripheral areas where integrity has been compromised.
- District boundaries should not include “buffer zones,” acreage or open space that does not directly contribute to the significance of the district. However, surrounding land that does contribute to the district, such as the farmland associated with a farmstead or a park included in the original plan for a subdivision, should be included.
- Include small areas of non-historic resources when they are completely surrounded by a concentration of historic resources. Drawing “donut holes” around non-historic resources within the district is not allowed. Non-historic resources within the boundaries of the district should be included but identified as non-contributing resources.

- Owner consent should not be a consideration in determining a local historic district boundary. The *Secretary of the Interior's Guidelines* state that a historic district is a "significant concentration" of resources "united by plan or design" not limited by "current parcels of ownership."

Discontiguous Districts

A historic district is typically a concentrated area of contiguous resources. Occasionally there will be situations where resources are related by significance but separated by geography. A discontiguous district can be established when:

- Visual continuity is not a factor of historic significance. For example, a cemetery that is located a short distance outside of a rural village.
- Resources are geographically separate and the space between them is not related to the significance of the district. For example, a mineshaft, and the headquarters of the company that operated it, are separated by a mile or so of unrelated geographical space.
- Manmade resources that are interconnected by natural features, such as a canal system that incorporates natural waterways.

The discontiguous district should **NOT** be used to include an isolated resource or group of resources that have been cut off from the district due to demolition or new construction.

Single Resource Districts

Michigan's *Local Historic Districts Act*, Public Act 169 of 1970, as amended, (PA 169) defines a historic district as:

An area or group of areas not necessarily having contiguous boundaries, that contains 1 resource or a group of resources that are related by history, architecture, archeology, engineering, or culture.

To clarify how this applies to the work of the historic district study committee and the creation of single resource districts, the Michigan Historical Center adopted *Criteria for Evaluating Resources for Inclusion in Local Historic Districts* in August 2002 (see Appendix A). These criteria state that study committees shall use the *Secretary of Interior's Guidelines* for establishing historic district boundaries. If the *Secretary's Guidelines* are appropriately applied, then a single resource district is one in which the resource meets the criteria for eligibility for the National Register of Historic Places on its own merit for its association with a significant person, event or as an example of significant design or construction technique. Appropriate single resource districts would include Michigan's State Capitol Building; a house designed by Frank Lloyd Wright; Ernest Hemingway's summer cottage; a round barn; or an outstanding example of the Art Deco style.

Thus, it would **NOT** be appropriate to single out one bungalow in the middle of a neighborhood of bungalows as a single resource district. It would **NOT** be appropriate to single out one commercial building in a three block commercial district, if the building had no special significance. Instead, such resources would be considered to be historic (contributing) resources in larger historic districts.

When determining boundaries for a single resource district it is important to consider the setting of the resource and to include the features that define the character of the resource, such as the view shed of a house built on a hill or a historic garden, drive, or entry posts associated with a resource. Don't limit the district boundary simply to the footprint of a building.

In September 2001 the State of Michigan Court of Appeals ruled in *Draprop v City of Ann Arbor* that the city limits could not be used as a boundary to designate an Individual Properties Historic District if those properties were unrelated in terms of their historic significance. The city had attempted to designate over seventy disparate individual resources such as apartment buildings, churches, gas stations, a bus station, etc. in one district. The important factor in this case is that the resources in the district were unrelated by history, architecture, archaeology, engineering, or culture. Though each of the properties would qualify as an individual resource on its own merit, they could not be lumped into one "individual properties" district. It is appropriate, however, to use a thematic approach to link individual or related resources within a city into one district.

Example: all apartment buildings built between 1900 and 1930 or farmsteads constructed between 1860 and 1920.

Boundary Justification

The historic district study committee must be able to justify each individual directional boundary of the proposed district according to the guidelines developed by the U.S. Secretary of the Interior. Justifying the boundaries is important because properties within local historic districts will qualify for preservation incentives while those outside will not. The boundary justifications should include a concise explanation of why the boundaries were chosen, based on geography, integrity and/or significance, and address any irregularities in the boundaries and why they are there (loss of integrity).